

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION**

EARL GAVIN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 7:18-cv-00523-DCC-JDA
	)	
EXPERIAN INFORMATION SOLUTIONS,	)	
INC.; TRANS UNION LLC; and	)	
EQUIFAX, INC.,	)	
	)	
Defendants.	)	

**DEFENDANT TRANS UNION LLC’S  
ANSWERS TO LOCAL RULE 26.01 INTERROGATORIES**

Trans Union LLC (“Trans Union”), the Defendant herein, files its Answers to Local Rule 26.01 Interrogatories as follows:

**(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.**

**Response:** None known by Trans Union at this time.

**(B) As to each claim, state whether it should be tried jury or nonjury and why.**

**Response:** The claims appear to be causes of action triable by a jury.

**(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.**

**Response:** Trans Union LLC is a wholly owned subsidiary of TransUnion Intermediate Holdings, Inc. TransUnion Intermediate Holdings, Inc. is wholly owned by TransUnion. TransUnion is a publicly traded entity. Investment funds affiliated with of Goldman Sachs Group, Inc., a publicly traded entity, owns more than 10% of TransUnion’s

stock. Investment funds affiliated with T. Rowe Price Group, Inc., a publicly-traded entity, also owns more than 10% of TransUnion's stock. No public company directly owns 10% or more of the ownership in Trans Union LLC.

**(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).**

**Response:** Trans Union does not challenge the appropriateness of the Division.

**(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.**

**Response:** Trans Union is not aware of any relationship of this matter to any other matter currently filed in this District.

**(F) If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.**

**Response:** Without waiving any defenses or conceding any liability, Defendant Trans Union has been properly identified in the style of this case.

**(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said identity.**

**Response:** Trans Union makes no such contention at this time, but reserves the right to supplement its answer after discovery has been conducted.

Respectfully Submitted,

*s/Wilbur E. Johnson*

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Wilbur E. Johnson

Federal ID No.: 2212

YOUNG CLEMENT RIVERS, LLP

P.O. Box 993

25 Calhoun Street, Suite 400

Charleston, SC 29401

Telephone: (843) 724-6659

Facsimile: (843) 579-1332

Email: [wjohnson@ycrlaw.com](mailto:wjohnson@ycrlaw.com)

**COUNSEL FOR TRANS UNION LLC**

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the above and foregoing document has been served on the following non-CM/ECF participant via First Class Mail and Electronic Mail on the 20th day of March, 2018:

Earl Gavin  
300 Marion Avenue  
Gaffney, SC 29341  
[Egav1986@gmail.com](mailto:Egav1986@gmail.com)  
Plaintiff *Pro Se*

*s/Wilbur E. Johnson*

Wilbur E. Johnson